

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

JANE ROE,

Plaintiff,

-against-

STIPULATION AND PROTECTIVE ORDER
Civil Action No. 1:19-CV-0909 GLS/CFH

UNION COLLEGE, THE BOARD OF
TRUSTEES OF UNION COLLEGE,

Defendants.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned,
as follows:

1. That the plaintiff has moved to proceed under a pseudonym and for a protective order (Dkt. 5);
2. That the parties stipulated and agree that plaintiff shall continue to be referred to as "Jane Roe" relative to this action;
3. That all documents filed in this action which reference or refer to Jane Roe's identity or identifying information, including her name, date of birth, social security number, and address, shall be redacted or filed under seal in order to protect Jane Roe's identity;
4. That this stipulated protective order includes disclosure which may contain Jane Roe's identity or identifying information;
5. That the parties agree that counsel of record in this action and their staff; any retained consultants; any witness at deposition and/or trial; any juror or fact finder should the document be admitted into evidence; and/or any mediator and/or arbitrator who may be retained by the parties and/or assigned to mediate may be notified of

plaintiff's identity to the extent necessary to litigate this action, by operation of law and/or pursuant to Court Order;

6. That the parties agree that this stipulated protective order shall be without prejudice as to the right of any party to oppose production of any information or object to its admissibility into evidence or from seeking an order modifying this stipulated protective order;

7. That this stipulated protective order shall survive the conclusion of this action, and the Court shall retain jurisdiction to resolve any dispute concerning the use of information disclosed hereunder.

DATED: 10/16/19

CARTER, CONBOY, CASE, BLACKMORE,
MALONEY & LAIRD, P.C.

By: 

MICHAEL J. MURPHY

Bar No. 102244

Attorneys for Defendants

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Albany, New York 12211

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DATED: 10/16/19

NESENOFF & MILTENBERG, LLP

By: 

GABRIELLE VINCI

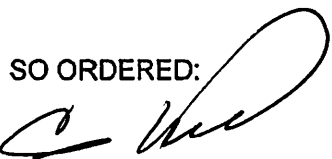
Attorneys for Plaintiff

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SO ORDERED:



Hon. Christian F. Hummel
U.S. Magistrate Judge